## UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| GC2 INCORPORATED,                        | )<br>)  |  |
|--|---|--|
| Plaintiff,                               | ) Case No.: 1:16-cv-08794   |  |
| vs.                                      | ) JURY TRIAL DEMANDED   |  |
| International Game Technology PLC, et al | <ul> <li>Judge: Matthew F. Kennelly</li> <li>Magistrate Judge: Mary M. Rowland</li> </ul> |  |
| Defendants.                              | )<br>)  |  |

## PLAINTIFF GC2 INCORPORATED'S UNOPPOSED MOTION FOR LEAVE TO FILE OPPOSITION TO MOTION TO DISMISS EXCEEDING THE COURT'S PAGE LIMIT

Plaintiff GC2 Incorporated ("GC2"), by its undersigned counsel and pursuant to Local Rule 7.1, respectfully seeks leave to file a brief in Opposition to Defendants International Game Technology, IGT and DoubleDown Interactive LLC's ("IGT Defendants") Rule 8(a) and 12(b)(6) Motion to Dismiss (Dkt. 60 and 61) exceeding the Court's 15-page limit, up to and including 20 pages. In support of its Motion for Leave, GC2 states as follows:

- 1. GC2 filed its Amended Complaint in this action asking the Court to stop defendants from using and distributing its federal registered copyrighted works and to award damages for their unauthorized use on October 28, 2016. (Dkt. 18.)
- 2. IGT Defendants, Defendant IGT PLC,<sup>1</sup> Defendant WD Encore Software, LLC ("Encore"), and Defendant Masque Publishing, Inc., each filed separate motions to dismiss on December 20, 2016.

<sup>&</sup>lt;sup>1</sup> In addition to its Rule 12(b)(2) motion challenging personal jurisdiction, for which discovery is currently pending and GC2's response is currently stayed, IGT PLC incorporated by reference the Rule

- 3. Counsel for GC2 believes it will need additional pages beyond the Court's 15-page limit to adequately address the arguments made under Rules 8(a) and 12(b)(6) by IGT Defendants, some of which are expressly incorporated by reference in the separate motions to dismiss filed by other defendants. (*See* Dkt. 64, at 15; Dkt. 67, at 3.)
- 4. Counsel for GC2 has conferred with counsel for IGT Defendants on the requested page limit extension. IGT Defendants have no objection to the relied requested in this Motion. Counsel for GC2 has advised counsel for IGT Defendants that it has no objection to a similar five page extension for the reply brief to be filed by IGT Defendants.
- 5. This is GC2's first request to exceed any briefing limit, and GC2 believes that no prejudice will result to any defendant as a result of this page limit extension.

WHEREFORE, GC2 respectfully requests leave to extend the page limit of its brief in Opposition to IGT Defendants' Motion to Dismiss, up to and including 20 pages.

Dated: January 30, 2017 Respectfully submitted,

/s/Kara E. F. Cenar

Kara E. F. Cenar (ARDC 6198864)

(kcenar@greensfelder.com)

Rick Meza

Ryan Yager

Greensfelder, Hemker & Gale, P.C.

200 W. Madison St., Ste. 3300

Chicago, IL 60606

312-419-9090 (T)

312-419-1930 (F)

John E. Petite

(jep@greensfelder.com)

Kirsten M. Ahmad

(km@greensfelder.com)

Greensfelder, Hemker & Gale, P.C.

10 South Broadway, Ste. 2000

St. Louis, Missouri 63102

<sup>8(</sup>a) and 12(b)(6) arguments made by IGT Defendants (Dkt. 64, at 15), and GC2's response to IGT Defendants will therefore similarly respond to IGT PLC's incorporated motions.

(314) 516-2698 (T) (314) 241-8624 (F)

Attorneys for Plaintiff GC2 Incorporated

## **CERTIFICATE OF SERVICE**

| I hereby certify that a copy of the foregoing document was filed electronically             | with | the |
|---|------|-----|
| Clerk of the Court to be served by operation of the Court's electronic filing system this 3 | 30th | day |
| of January, 2017, upon all counsel of record.   |      |     |

| /s/ R | Lyan J. Yager |
|-------|---------------|
|       |               |